



# ASL SERVICES HOLDINGS, LLC.

GLOBAL VRS  
3700 COMMERCE BOULEVARD  
KISSIMMEE, FLORIDA 34741

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Via Overnight Delivery and Electronic Comment Filing Submission (ECFS)

October 29, 2015

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

ATTN: Chief, Consumer and Governmental Affairs Bureau

RE: ASL Services Holdings, LLC Annual Compliance Report, Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Secretary Dortch:

Pursuant to Section 64.606(g) of the Commission's rules, 47 C.F.R. §64.606(g), ASL Services Holdings, LLC. ("ASL/Global VRS") is pleased to submit the attached *Annual Compliance Report* to the Commission. By this submission, ASL/Global VRS demonstrates and certifies its continued compliance with the Commission's Mandatory Minimum Standards ("MMS") for the provision of Telecommunications Relay Service Fund ("Fund") eligible Internet-based video relay services ("VRS") as set forth in Section 64.604 *et seq.* of the Commission's rules, 47 C.F.R. §§64.604 *et seq.*

Beyond the Company's continued MMS compliance in 2015, the Company has strived to improve overall customer VRS experience, despite a declining compensation structure. ASL/Global VRS has been actively involved in interoperability collaboration with other providers.<sup>3</sup> The Company has also made various updates and improvements to existing IOS, Android and PC applications to ensure interoperability with other providers and enhanced video mail messaging capabilities for users. In 2015, ASL/Global has hired a deaf Vice president of Sales & Marketing who is working to promote corporate branding, among other initiatives. Further the Company has been active in testing new applications to better support Deaf/Blind users, while considering expansion of its relay service capabilities. ASL/Global VRS has also actively participated in meetings with the Commission, regulatory proceedings, monthly Fund administrator meetings, meetings with the Fund Administrator for development of the User Registration Database, and worked with both consumer groups and competing providers to offer recommendations to continue innovating VRS.

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<sup>3</sup> ASL/Global will be hosting the interoperability meeting in November 2015.

Ms. Marlene H. Dortch  
October 29, 2015  
Page 2

Also in 2015, despite the financial challenges associated with the Commission's the declining rate structure, ASL/Global VRS has continued to deploy modest-sized interpreting centers by maintaining lean operations and through affiliated company investment. The Company extended its outreach efforts, with continued focus on the Spanish-speaking community, hosting more than 35 regional and national Deaf Community events in the U.S., Puerto Rico, and Mexico. ASL/Global VRS has experienced modest growth in 2015, and will continue to expend significant effort and resources in redesigning its registration process in anticipation of the Commission's User Registration Database deployment.

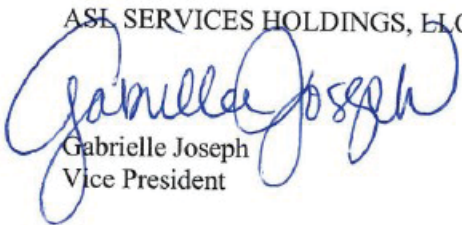
**Request for Confidential Treatment.** Pursuant to Section 0.459 of the Commission's rules, 47 C.F.R §0.459, and "Exemption 4" of the Freedom of Information Act,.. ASL respectfully requests confidential treatment of the confidential version of its *Annual Compliance Report*. The confidential version contains proprietary information not intended for public consumption. ASL would not make such information public under any circumstance. Release of the confidential version of its *Annual Compliance Report* to the public could cause ASL irreparable and inestimable harm. ASL requests that the confidential version of its *Annual Compliance Report* be withheld from public inspection, accordingly. Should disclosure of the confidential version of its *Annual Compliance Report* be requested, ASL requests that it be informed of such request so that ASL may take appropriate action to safeguard its interests.

Pursuant to the Commission Disability Rights Office's May 7, 2012 guidance for submission of reports required by the telecommunications relay service rules, a confidential version, and separate public version are being submitted electronically to [TRSreports@fcc.gov](mailto:TRSreports@fcc.gov). A redacted public version of the enclosed Petition has been filed electronically via the Commission's Electronic Comment Filing System in this proceeding. A certification of the truthfulness, accuracy, and completeness of this Report by its Vice President, an ASL/Global VRS officer and minority owner, is attached pursuant to Section 64.606(g)(2). The Company also submits its annual *CPNI Certification* pursuant to Section 64.5109(e) of the Commission's rules, 47 C.F.R. §64.606(g).

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

ASL SERVICES HOLDINGS, LLC



Gabrielle Joseph  
Vice President

Attachments

cc: Ms. Karen Peltz Strauss (via electronic delivery, [Karen.Strauss@fcc.gov](mailto:Karen.Strauss@fcc.gov))  
Mr. Greg Hlibok (via electronic delivery, [Gregory.Hlibok@fcc.gov](mailto:Gregory.Hlibok@fcc.gov))  
[TRSreports@fcc.gov](mailto:TRSreports@fcc.gov)

## ASL Services Holdings, LLC 2015 Annual Compliance Report

### I. INTRODUCTION

Pursuant to Section 64.606(g) of the Commission’s rules, 47 C.F.R. §64.606(g), ASL Services Holdings, LLC (“ASL/Global VRS”) is pleased to submit its initial *Annual Compliance Report* (“Report”).<sup>3</sup> This Report demonstrates ASL/Global VRS’ continued compliance with the Commission’s Mandatory Minimum Standards (“MMS”) for the provision of Internet-based video relay services (“VRS”).

ASL/Global VRS is a privately-held woman and minority-owned Florida limited liability company. ASL/Global VRS is Interpreter-owned and operated. The Company employs trilingual (English, Spanish and American Sign Language) interpreters with strong ties to the Deaf and Hard-of-Hearing community. ASL/Global VRS currently serves thousands of individuals with speech or hearing impairments, including underserved Spanish-language users.

By its report, ASL/Global VRS demonstrates that the Company meets and/or exceeds the MMS for the provision of Fund eligible VRS. In the past year, ASL has applied its unique trilingual, skill set<sup>4</sup> to interpret nearly [REDACTED] calls representing more than [REDACTED]

percent growth rate in 2015 representing a fourth year of annual usage growth rate, while exceeding Commission speed of answer requirements.

In November 2015, [REDACTED]

in December 2015 to accommodate increased traffic. Both centers are very modest in size, will accommodate four Interpreting stations, and will allow to bring in additional resources to accommodate call volume for the Pacific Time Zone and also bring in additional resources to continue our stellar reputation among the Hispanic deaf communities we service.

Per Section 64.606(g)(1), the following verified Report updates compliance information, where applicable. Otherwise ASL/Global VRS certifies that there are no changes to the information and documentation submitted with its Application for certification.<sup>5</sup> A certification of the truthfulness, accuracy, and completeness of this Report by its Vice President, an ASL/Global VRS officer and minority owner, is attached pursuant to Section 64.606(g)(2).

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<sup>3</sup> *Notice of Conditional Grant of Application of ASL Services Holdings, LLC for Certification as a Provider of Video Relay Service Eligible for Compensation from Interstate Telecommunications Relay Service Fund*, CG Docket No. 10-51, *Public Notice*, DA 11-1902 (November 15, 2011).

<sup>4</sup> American Sign Language, Spanish, and English.

<sup>5</sup> *See, e.g. In the Matter of Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, *Application Of ASL Services Holdings, LLC* (September 6, 2011)(*Supp.* November 9, 2011)[“Application”].

## **II. SECTION 64.606(a)(2) UPDATE**

ASL/Global VRS provides the following updates to the information contained in the Company's Application, as cited, pursuant to Section 64.606(a)(2) of the Commission's rules, 47 C.F.R. §64.606(a)(2):

**(i) A description of the forms of Internet-based TRS to be provided (i.e., VRS, IP Relay, and/or IP captioned telephone relay service);**

There is no change in ASL/Global VRS's provision of VRS services as a conditional Fund eligible provider; Application page 8.

**(ii) A detailed description of how the applicant will meet all non-waived mandatory minimum standards applicable to each form of TRS offered, including documentary and other evidence, and in the case of VRS, such documentary and other evidence shall demonstrate that the applicant leases, licenses or has acquired its own facilities and operates such facilities associated with TRS call centers and employs communications assistants, on a full or part-time basis, to staff such call centers at the date of the application. Such evidence shall include, but not be limited to:**

**(A) In the case of VRS applicants or providers,**

**( 1 ) Operating five or fewer call centers within the United States, a copy of each deed or lease for each call center operated by the applicant within the United States;**

In September 2015, ASL/Global VRS submitted a substantive change notice advising the Commission of ASL/Global VRS' deployment of a call center in [REDACTED]

.<sup>6</sup> This is the [REDACTED] interpreting center operated by the Company; Application page 9, Exhibit A.

**( 2 ) Operating more than five call centers within the United States, a copy of each deed or lease for a representative sampling (taking into account size (by number of communications assistants) and location) of five call centers operated by the applicant within the United States, together with a list of all other call centers that they operate that includes the information required under §64.604(c)(5)(iii)(N)( 2 );**

Leases for call centers added in 2015 are attached.

**( 3 ) Operating call centers outside of the United States, a copy of each deed or lease for each call center operated by the applicant outside of the United States;**

Inapplicable. ASL/Global VRS does not operate call centers outside of the U.S.; Application page 9.

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<sup>6</sup> See ASL/Global VRS Substantive Change Notices September 15, 2015 and September 30, 2015.

**( 4 ) A description of the technology and equipment used to support their call center functions-including, but not limited to, automatic call distribution, routing, call setup, mapping, call features, billing for compensation from the TRS Fund, and registration-and for each core function of each call center for which the applicant must provide a copy of technology and equipment proofs of purchase, leases or license agreements in accordance with paragraphs (a)(2)(ii)(A)(5) through (7) of this section, a statement whether such technology and equipment is owned, leased or licensed (and from whom if leased or licensed);**

No Change. In 2015 the Company successfully maintained our IOS-based Mobile VRS application in English and Spanish and continually enhance user interfaces. Otherwise there were no material changes. Application page 10, Exhibit B.

The Company is initiating development of interfaces with the URD and is prepared to work with the Rolka Loubé to test interfaces at such time that test trials may be conducted.

ASL/GlobalVRS has also cooperatively worked with MITRE in providing access to all current technology produced by GlobalVRS.

**( 5 ) Operating five or fewer call centers within the United States, a copy of each proof of purchase, lease or license agreement for all technology and equipment used to support their call center functions for each call center operated by the applicant within the United States;**

Inapplicable. *See* item (1), *Supra*.

**( 6 ) Operating more than five call centers within the United States, a copy of each proof of purchase, lease or license agreement for technology and equipment used to support their call center functions for a representative sampling (taking into account size (by number of communications assistants) and location) of five call centers operated by the applicant within the United States; a copy of each proof of purchase, lease or license agreement for technology and equipment used to support their call center functions for all call centers operated by the applicant within the United States must be retained by the applicant for three years from the date of the application, and submitted to the Commission upon request;**

Leases for call centers added in 2015 are attached.

**( 7 ) Operating call centers outside of the United States, a copy of each proof of purchase, lease or license agreement for all technology and equipment used to support their call center functions for each call center operated by the applicant outside of the United States; and**

Inapplicable. *See* item (3), *Supra*.

<sup>7</sup> These call center leases had not originally been included with the respective *Notification of Substantive Changes*.

**( 8 ) A complete copy of each lease or license agreement for automatic call distribution.**

No change; Application page 10, Exhibits B.

**(B) For all applicants, a list of individuals or entities that hold at least a 10 percent equity interest in the applicant, have the power to vote 10 percent or more of the securities of the applicant, or exercise de jure or de facto control over the applicant, a description of the applicant's organizational structure, and the names of its executives, officers, members of its board of directors, general partners (in the case of a partnership), and managing members (in the case of a limited liability company);**

No change; Application page 11.

**(C) For all applicants, a list of the number of applicant's full-time and part-time employees involved in TRS operations, including and divided by the following positions: executives and officers; video phone installers (in the case of VRS), communications assistants, and persons involved in marketing and sponsorship activities;**

In the fall of 2015, a new VP of Sales and Marketing was added to our management team. The Company currently employs a total of [REDACTED]  
employees who are directly responsible for the provision of VRS.

**(D) For all applicants, copies of employment agreements for all of the provider's employees directly involved in TRS operations, executives, and communications assistants, and a list of names of employees directly involved in TRS operations, need not be submitted with the application, but must be retained by the applicant for five years from the date of application, and submitted to the Commission upon request; and**

No change; Application page 12. ASL will provide the Commission with a copy of all employment agreements immediately upon request.

**(E) For all applicants, a list of all sponsorship arrangements relating to Internet-based TRS, including on that list a description of any associated written agreements; copies of all such arrangements and agreements must be retained by the applicant for three years from the date of the application, and submitted to the Commission upon request;**

No change; Application page 12.

**(iii) A description of the provider's complaint procedures; and**

With the advent of VRS Customer Proprietary Network Information (“CPNI”) regulations, ASL/Global VRS began implementing procedures to ensure compliance with CPNI regulations and provide additional training to interpreters. Otherwise there is no change; Application pages 12 and 13. The Company’s annual Consumer Complaint Log Submission was filed on June 23, 2015.



(iv) A statement that the provider will file annual compliance reports demonstrating continued compliance with these rules.

Please see attached certification.

(v) The chief executive officer (CEO), chief financial officer (CFO), or other senior executive of an applicant for Internet-based TRS certification under this section with firsthand knowledge of the accuracy and completeness of the information provided, when submitting an application for certification under paragraph (a)(2) of this section, must certify as follows: I swear under penalty of perjury that I am (name and title), an officer of the above-named applicant, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

Please refer to attached certification.

(vi) **Assessment of Internet-Based Provider Certification Application** (47 C.F.R. §64.606(a)(3))

ASL/Global VRS participated in various audits from 2014. To date, there are no outstanding findings from previous audits. No audits have been required to date in 2015. ASL/GlobalVRS will continue to fully cooperate with any scheduled audits from the Commission.

(vii) **Substantive Changes** (47 C.F.R. §64.606(f)(2))

On September 15, 2015, ASL/Global VRS provided the Commission with a substantive change notice regarding the opening of its [REDACTED] call center in California. (see footnote 6, *Supra*.) On September 30, 2015, ASL/Global VRS provided the Commission with a substantive change notice regarding the opening of its [REDACTED] . (see footnote 6, *Supra*.)

(viii) **Substantive Changes** (47 C.F.R. §64.606(f)(2))

No service interruptions have been reported in 2015.

### **III. ASL/GLOBAL VRS COMPLIANCE WITH SECTION 64.604, MANDATORY MINIMUM STANDARDS.**

Company continues to meet MMS for the provision of VRS, and hereby provides the following compliance updates to its Application, which it incorporates herein by reference as otherwise unchanged.

#### **A. Operational Standards.**

##### **1. Communications Assistant (“CA”) – Training (47 C.F.R. §64.604(a)(1)) and 64.606(g)(3)(ii).**

ASL/Global VRS has continued to enhance its initial training program by producing new stimulus materials for our internal evaluation process. All employees, even Certified Interpreters, have still been required to complete the new evaluation process to continue ongoing professional development of our Interpreting Team. In addition, an internal CPC (Code of Professional Conduct) test is also mandatory for each employee to successfully pass in order to maintain employment.

##### **2. Communications Assistant – Confidentiality and conversation content. (47 C.F.R. §64.604(a)(2))**

See discussion regarding CPNI regulation compliance, *Infra*.

##### **4. Handling of emergency calls. (47 C.F.R. §64.604(a)(4)) and amended Section 64.605.**

No change. Application page 23.

#### **B. Technical Standards**

##### **2. Speed of Answer. (47 C.F.R. §64.604(b)(2)(iii)).**

ASL/Global VRS’s speed of answering is for the 12 month period ending October 31, 2015 is [REDACTED] percent of calls answered within 120 seconds or less, well above the established standard. At no time during this period did the Company’s percentage of calls answered within 120 seconds drop below [REDACTED] percent. This represents the fourth annual increase in speed of answer time over the same 12 month period last year. Improvement came at a cost of adding interpreting staff

##### **5. Technology. (47 C.F.R. §64.604(b)(5)).**

The Company made enhancements to its wireless applications to make them more user friendly and improve accessibility by users.

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<sup>8</sup> Health Insurance Portability and Accountability Act of 1996.



**C. Functional Standards**

**2. Contact Persons. (47 C.F.R. §§64.604(c)(2)) and 64.606(g)(3)(i))**

The senior individual responsible to receive complaints, grievances, inquiries, and suggestions for ASL/Global VRS and officers responsible for compliance with section 64.604(c)(13) are as follows.

Representatives:

Gabrielle Joseph

ASL Services Holdings, LLC/GraciasVRS

3700 Commerce Blvd.

Kissimmee, Florida 34741

Phone: 888-472-6768 (Spanish VRS)

888-472-6778 (English VRS)

E-Mail: Gabrielle@aslservices.com

Website: www.GlobalVRS.com

Facsimile: 407.518.7903

Voice Telephone: 1.877.DAME.VRS ( 1.877.326-3877)

English and Spanish VP Users: Globalvrs.tv

**3. Public Access to Information. (47 C.F.R. §64.604(c)(3)).**

Despite the Commissions actions to remove Outreach from the current compensation mechanism, ASL/Global VRS has continued to expanded its outreach efforts in educating the public and stakeholders about trilingual (English, Spanish, American Sign Language) VRS Services. In 2015, the Company extended its outreach efforts, with continued focus on the Spanish-speaking community, hosting more than 35 regional and national Deaf Community events in the U.S., Puerto Rico, and Mexico. The Company has also continued to make significant efforts to design new registrant notifications consistent with Commission rules, the Electronic Signatures Act, and the Commission's Customer Proprietary Network Information rules.

**6. Data Collection and Audits from TRS Providers (47 C.F.R. §64.604(c)(5)(iii)(D))**

ASL/Global VRS has timely submitted all data to the TRS Fund Administrator and appointed auditors.

**Whistleblower protections (47 C.F.R. 64.604(c)(5)(iii)(M))**

ASL/Global VRS addresses Whistleblower protection requirements as part of its initial employee orientation and incorporated into more formalized training program.

**IV. COMPLIANCE WITH SECTION 64.606(g)(3)**

**1. Identification of any officer(s) or managerial employee(s) responsible for ensuring compliance with §64.604(c)(13) of this subpart; (47 C.F.R. §64.606(g)(3)(i))**

Please refer to Section III.C.2. at page 8, *supra*.

**2. A description of any compliance training provided to the provider's officers, employees, and contractors; (47 C.F.R. §64.606(g)(3)(ii))**

Please refer section III.A.1. at page 7, *supra*.

**3. Identification of any telephone numbers, Web site addresses, or other mechanisms available to employees for reporting abuses; (47 C.F.R. §64.606(g)(3)(iii))**

Please refer to Section III.C.2. at page 6, *supra*. In addition to contacting Company officers, an FCC Updates page is contained in the Company's web site, <http://globalvrs.com/globalvrs-fcc-updates/the-fcc-needs-you/>. This page contains hyperlinks to various Commission links in English and Spanish. Additionally, employees are advised that they may also contact the Commission directly:

Federal Communications Commission  
Consumer and Government Affairs Bureau  
Consumer Inquiries and Complaints Division  
445 12th Street  
Washington DC 2055  
VOICE: 1-888-CALL-FCC  
TTY: 1-888-TELL-FCC  
[www.fcc.gov/complaints](http://www.fcc.gov/complaints)

**4. A description of any internal audit processes used to ensure the accuracy and completeness of minutes submitted to the TRS Fund administrator; (47 C.F.R. §64.606(g)(3)(iv))**

All usage reporting is automated through the Company's platform. There is no capability for manual access to reported data.

ASL/Global VRS' continues to use the reporting built in the existing platform that has been programed to prepare a "Daily FCC Report." This report lists call detail record, speed of answer and verified conversation minutes from the previous day. These data populate the Daily Administration Report (DAR) which contains all the statistical data reported to the Fund Administrator. The "Daily FCC Report" is statistically sampled by the Company and cross-referenced to the interpreters' manual log sheets to ensure accuracy. Company and also review any reports/updates/events/feedback form our Administrative Team. A Monthly Verification Report (MVR) is created to audits the results of the DAR report analysis to verify the final monthly reports and ensure accuracy of the monthly Fund Administrator submissions.

**5 A description of all policies and practices that the provider is following to prevent waste, fraud, and abuse of the TRS Fund. A provider that fails to file a compliance plan shall not be entitled to compensation for the provision of VRS during the period of noncompliance. (47 C.F.R. §64.606(g)(3)(v))**

ASL/Global VRS has implemented an extensive screening process to ensure service quality.

A Whistleblower Policy is incorporated into the Company's employee handbook. This policy encourages employees to immediately report any illegal activity directly to the Commission and advise senior management. Employees receive training on applicable Commission regulations.

ASL/GlobalVRS has maintained quarterly meetings where employees are briefed on Commission regulations and industry activity. A copy of the Commission's Mandatory Minimum Standards and other attendant regulations are available in each video interpreter cubical as a reference. This not only ensures that video interpreters are familiar with Commission requirements but underscores the Company's stringent compliance commitment.

The Company has established a regulatory framework to assess Company compliance with the entirety of applicable Commission rules to identify areas of improvement.

ASL/GlobalVRS continues to update its technical practices to prevent waste, fraud, and abuse. The Company's platform automatically screens out any non-U.S. Internet Protocol addresses or unregistered TDN. In 2013, the Company implemented a platform function that requires video interpreters to affirmatively authenticate the validity of each call at the end of the call and identify the call as BILLABLE or NON-BILLABLE. This affirmative authentication provides another layer of fundamental decision making and empowerment to the Company's video interpreters to report any call they feel would be non-compensable or breaking any form of FCC regulation.

**§ 64.604 Mandatory minimum standards.**

(d) Other standards—The applicable requirements of sections 64.605, 64.611, 64.615, 64.617 (Neutral Video Communications Service Platform – Inapplicable to ASL), 64.621, 64.631, 64.632, 64.5105, 64.5107, 64.5108, 64.5109 and 64.5110 of this part are to be considered mandatory minimum standards.

In addition to the foregoing, ASL/Global VRS has been actively developing procedures and technological applications to comply with the following new MMS requirements:

**Section 64.611 Internet-based TRS registration.**

**Section 64.615 TRS User Registration Database and administrator.**

ASL/Global VRS continues to expend considerable resources in the redesign of an online registration system that captures all necessary subscriber information, while providing detailed information to subscribers including CPNI and the Electronic Signatures Act disclosures in written and video formats to ensure subscriber understanding and to ensure full compliance with Commission

rules. The Company is testing its new registration process and is prepare to deploy the registration process with deployment of the new TRS-User Registration Database.

**Section 64.621. Interoperability and portability.**

In 2015, solely at its own expense, ASL/Global VRS participated in each of the semi-annual industry SIP interoperability sessions. ASL/Global VRS will be the first of the emerging providers to host this SIP Interoperability Conference in November 2015. The Company has also joined an industry compliance forum to share information and discuss issues with the Commission.

**Section 64.631 Verification of orders for change of default TRS providers.**

**Section 64.632 Letter of authorization form and content.**

ASL/Global VRS has designed a Letter of Authorization in anticipation of final adoption of the account verification regulations. The letter mirrors those used in the wireline telecommunications industry. Additional clarification regarding information to be obtained from commercial subscribers remains pending Commission determination.

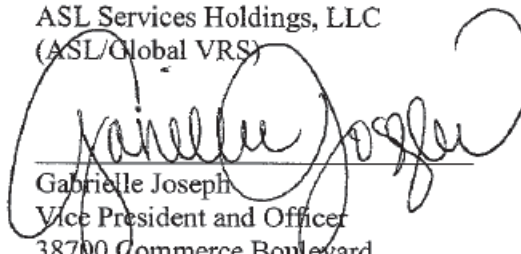
**CPNI Requirements for Relay Service Providers. Section 64.5101 *et seq.***

ASL/Global VRS has implemented a privacy policy for subscribers and additional disclosures in anticipation of full implementation of the CPNI regulations. Further, the Company has designed a CPNI training program, updated its employee manual, and instituted procedures for periodic interpreter CPNI reviews and new employee training. The Company has also expanded its data retention and data storage procedures.

Pursuant to Section 64.5109(e), attached hereto is ASL/Global VRS' initial CPNI compliance certification. Although initial submission of annual compliance certifications remains pending Office of Management and Budget approval of pending regulations including Section 64.5109, ASL/Global VRS voluntarily complies as a reflection of its CPNI compliance.

**V. CONCLUSION**

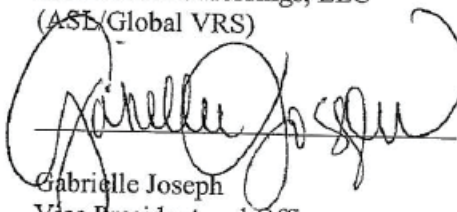
As demonstrated herein, ASL continues to meet the MMS and additional requirements for the provision of Fund-eligible VRS.

ASL Services Holdings, LLC  
(ASL/Global VRS)  
By:   
Gabrielle Joseph  
Vice President and Officer  
38700 Commerce Boulevard  
Suite 216  
Kissimmee, Florida 34741  
Telephone: 407.518.7900 ext. 201


STATE OF FLORIDA                     )  
  ) ss.  
COUNTY OF OSCEOLA             )

CERTIFICATION

I, Gabrielle Joseph, swear under penalty of perjury that I am a Vice President and an Officer of ASL Services Holdings, LLC (ASL/Global VRS), the reporting entity, and that I have personally examined the foregoing submission, and that all information required under the Commission's rules and orders have been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

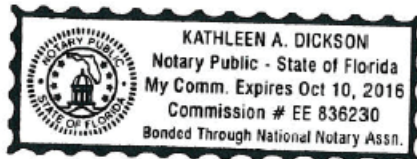
ASL Services Holdings, LLC  
(ASL/Global VRS)  
By:   
Gabrielle Joseph  
Vice President and Officer  
38700 Commerce Boulevard  
Suite 216  
Kissimmee, Florida 34741  
Telephone: 407.518.7900 ext. 201

Subscribed and Sworn to me this 29<sup>th</sup> day of October, 2015,

  
Notary Public

My Commission expires October 10, 2016

SEAL





## **Annual 47 C.F.R. §64.5105 *et seq.* CPNI Certification**

Annual Customer Proprietary Network Information ("CPNI") Certification covering the period January 1, 2014 through December 31, 2014, pursuant to 47 C.F.R. §64.5109(e).

Date Filed: October 29th, 2015

Name of Company covered by this Certification: ASL Services Holdings, LLC (ASL/Global VRS)

Name of Signatory: Angela Roth

Title of Signatory: Chief Executive Officer

Certification:

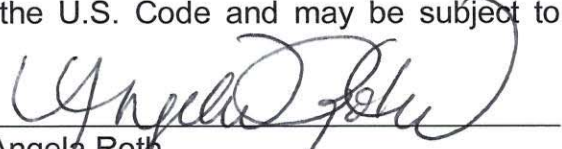
I, Angela Roth, certify that I am an officer of ASL Services Holdings, LLC (ASL/Global VRS), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules for Internet-based Telecommunications Relay Service Providers, 47 C.F.R. §64.5105 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.5105 *et seq.* of the Commission's rules as applicable.

The Company has not taken any actions (*i.e.* proceedings instituted or petitions filed by a company at either state commissions, the court system or the Commission against data brokers) against data brokers in the past year.

The Company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 19 of the U.S. Code and may be subject to enforcement action.

  
Angela Roth  
Managing Member, President and Chief  
Executive Officer  
ASL Services Holdings, LLC  
3700 Commerce Boulevard, Suite 216  
Kissimmee, Florida  
Telephone: 407.518.7900



## **Attachment 1: Statement Concerning Company Procedures**

ASL Services Holdings, LLC (ASL/Global VRS) ("Company") has established strict policies and procedures, which expressly prohibit release of Customer Proprietary Network Information ("CPNI") to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Employees who may have access to CPNI receive an initial CPNI protection briefing and periodic reminders thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. All contact with customers is documented through retention of electronic notes and retained for a minimum of three years, as set forth in 47 C.F.R. §64.5109. All sales or marketing campaigns initiated by the Company require approval of the officer responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

In calendar year 2014, the Company took no action against data brokers. In calendar year 2014, the Company received no consumer complaints regarding CPNI issues.